

Comments Re: RM-11392

1. I oppose the RM-11392 petition by Mark A. Miller seeking to change Amateur Radio Service automatically controlled data stations and narrower bandwidths on HF.
2. The RM-11392 petition is very bad for the Amateur Radio Service.
3. The RM-11392 petition seeks to destroy 21st century digital data technology advancement in the Amateur Radio Service. Please do not turn back the clock on digital data to the 20th century.
4. The RM-11392 petition's proposed 1.5kHz bandwidth limit on data emission is too narrow for established international standard transmissions and equipment bandwidths used by the Amateur Radio Service.
5. The RM-11392 petition is an attempt to kill innovation, technology advancement, and emergency data communications in the Amateur Radio Service. Please do not let this happen.
6. The FCC Amateur Radio Service's automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them. If a limit of 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data methods.
7. There is a huge installed base of Amateur Radio Equipment, and millions of dollars of monetary investment by thousands of Amateur Radio Operators that use HF digital data systems with more than 1.5kHz bandwidths. This investment by FCC-licensed operators would be taken away or rendered useless if the objectives of the RM-11392 petition were to be adopted.
8. Several of the primary established HF emergency communications networks currently in service and utilized by thousands of Amateur Radio Operators in USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.
9. The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6kHz or more.
10. Thousands of licensed Amateur Radio Operators would be disenfranchised if the objectives of RM-11392 were to be adopted.
11. The RM-11392 petition is comparatively similar to an Analog Cellular Phone service entity trying to eliminate newer Digital Cellular Phone service. The fact is, Amateur Radio is now using faster time-multiplexing digital methods to

enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These time division techniques require at least 3kHz of bandwidth.

12. RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

Respectfully Submitted,
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